

EXHIBIT 1

In The Matter Of:
EEOC vs.
New Breed Logistics

Jacquelyn Hines
May 19, 2011

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ORIGINAL

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A. Yes.

Q. So when I -- today I'm going to refer
to Select Staffing a lot.

A. Okay.

Q. That means Ablest.

10:28:05

A. Okay.

Q. Do you understand that?

A. Yes.

Q. I might call it Select from time to
time, too. Do you understand that I mean Select
Staffing?

10:28:09

A. Yes.

Q. So how long did you -- where was the
New Breed facility that you worked at?

A. Nail Road in Olive Branch.

10:28:23

Q. How long did you work at the Nail Road
facility?

A. I received two paychecks, so I would
say two to three weeks.

Q. And what were you doing at the Nail
Road facility?

10:28:49

A. Actually, we were still setting up.

Q. Do you remember how much you were
making?

A. No, I don't.

10:29:00

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1 Q. And this job on Nail Road, that was
2 not through a staffing company, right?

3 A. No.

4 Q. So on the application where it said
5 had you ever been employed by New Breed before, 10:29:19
6 you checked no, right?

7 A. Yes.

8 Q. What was your understanding of what
9 you would be doing at the Nail Road facility
10 after the setup? 10:29:33

11 A. Packing, receiving.

12 Q. I think I just asked you this, but I
13 don't remember the answer. Do you know how much
14 you were making when you were working at the Nail
15 Road facility? 10:30:07

16 A. No.

17 Q. Was it the same that you were making
18 when you were at the other New Breed facility?

19 A. I don't remember. I think it was a
20 little bit more, but I don't remember exactly how 10:30:20
21 much.

22 Q. It was more than \$10 an hour?

23 A. Yes.

24 MR. DEGROFF: Okay. We need to
25 change the tape on the camera. Why don't we 10:30:38

take a few minutes. Okay?

THE WITNESS: Okay.

MR. DEGROFF: And then we'll come
back and keep going.

THE VIDEOGRAPHER: The time is now 10:30:45
10:30. This is the end of Tape 1. We're going
off the record.

(BRIEF RECESS.)

THE VIDEOGRAPHER: The time is now
10:44. This is the beginning of Tape 2. We're 10:44:59
back on the record.

BY MR. DEGROFF:

Q. Ms. Hines, do you know that you're
still under oath?

A. Yes. 10:45:08

Q. Is there any reason why you can't
continue to answer my questions truthfully and
accurately?

A. No.

Q. All right. What was the reason you 10:45:14
were told that you were terminated from New Breed
when you were working at the Nail Road facility?

A. I was told that they were an at will
company and to read my handbook.

Q. Who told you that? 10:45:38

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1 A. I don't remember.

2 Q. Did you have a copy of the handbook?

3 A. No.

4 Q. Never were given a copy of the

5 handbook? 10:45:50

6 A. Oh, was I -- did I receive one? Yes.

7 Q. Okay. Do you know who made the

8 decision to terminate you from New Breed when you

9 were working at the Nail Road facility?

10 A. No. 10:46:15

11 Q. Do you know what they considered in

12 making that decision?

13 A. No.

14 Q. Do you know who they consulted in

15 making that decision? 10:46:26

16 A. No.

17 Q. Do you think that was discrimination

18 when you were fired from the Nail Road facility

19 at New Breed?

20 A. It could have been, but I don't know. 10:46:35

21 Q. Do you think it was retaliation when

22 you were fired from the Nail Road facility at New

23 Breed?

24 A. Yes.

25 Q. Why do you think that? 10:46:47

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A. I didn't feel like I gave them a

2 reason to terminate me.

3 Q. Other than the feeling that you didn't

4 give them a reason to terminate you, was there

5 any other reason why you felt that your

10:47:00

6 termination from New Breed's Nail Road facility

7 was retaliatory?

8 A. Now, yes, since I know that they got a

9 lawsuit against them, so I guess they found out

10 about that or something. I don't know.

10:47:22

11 Q. But you're guessing there?

12 A. That's what I think.

13 Q. Why do you think that?

14 A. Because like I said, I -- I did my job

15 and I was there on time every day, so I didn't

10:47:35

16 think that I gave them a reason to terminate me.

17 Q. So the one reason I've heard that you

18 think that it was retaliation was that you hadn't

19 given New Breed a reason to fire you from the

20 Nail Road facility?

10:47:50

21 A. Any -- no.

22 Q. Okay. Any other reason why you think

23 it was retaliation?

24 A. No.

25 Q. How long did you plan to work at New

10:48:05